

### **REMARKS/ARGUMENTS**

Reconsideration of this application is respectfully requested.

#### ***Specification***

The specification has been carefully reviewed and typographical errors have been corrected by way of amendment to paragraphs [0031], [0032] [0034] and [0041]. No new matter has been added.

#### ***Claim Objections***

Claims 1, 6, 19 and 26 were objected to for informalities. Each of the claims have been carefully reviewed, and claims 1, 3, 6, 7, 9, 15, 16, 18, 19, 20 and 26 have been amended to correct informalities. No new matter has been added and the claim objections have been traversed.

#### ***Claim Rejections-35 U.S.C. § 102***

The Office Action rejected claims 1, 2, 15 and 16 under 35 U.S.C. 102 as being anticipated by Oliver. Applicant respectfully disagrees.

Oliver teaches a wellhead isolation tool well known in the art with a "cup tool" (sealing cup 50; resilient packer ring 58; and, an annular packer shoe 60 more commonly referred to as a "gauge ring"). As well understood in the art, and explained in the background of the instant application, the cup tool taught by Oliver provides a fluid seal between a casing and the mandrel when the resilient packer ring 58 is expended by fluid pressure trapped by the sealing cup 50. However, the cup tool does not provide any engagement with the casing that reduces lifting stresses on the wellhead to which the wellhead isolation tool is anchored when the high pressure fluids are pumped into the well.

Nonetheless, for purposes of clarity, claims 1 and 15 are amended to recite internal mechanisms of the releasable packer assembly that cause casing-gripping slips to be forced outwardly into contact with the casing. This is neither taught nor suggested by Oliver or any known prior art.


The rejection of claims 1, 2, 15 and 16 is thereby traversed.

***Allowable Subject Matter***

Applicant to gratefully acknowledges that claims 3-14 and 17-26 were objected to as being dependent on a rejected base claim, but would be allowable if rewritten and independent form. However, in view the amendments made to claims 1 and 15, claims 1-26 pending in this application are now considered to be in a condition for immediate allowance.

Favourable reconsideration and early issuance of a Notice of Allowance is therefore requested.

Respectfully submitted,  
NELSON MULLINS RILEY  
& SCARBOROUGH, L.L.P.

  
\_\_\_\_\_  
Lloyd G. Farr  
Registration No. 38,446

1320 Main Street  
Columbia, SC 29201  
(404) 817-6165  
Fax (803) 255-9831